

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

GINNIE MCKNIGHT, JACQUELINE)	
GARRISON, and ADRIANA DE LEÓN,)	
individually and on behalf of all similarly)	
situated individuals,)	Case No. 1:23-cv-16118
)	
<i>Plaintiffs,</i>)	Hon. Georgia N. Alexakis
)	
v.)	Magistrate Jeffrey T. Gilbert
)	
UNITED AIRLINES, INC., a Delaware)	
corporation, and UNITED AIRLINES)	
HOLDINGS, INC., a Delaware corporation,)	
)	
<i>Defendants.</i>)	
)	

JOINT STATUS REPORT

Pursuant to the Court’s July 31, 2025 Order (Dkt. 80), Plaintiff, Jacqueline Garrison,¹ and Defendants, United Airlines, Inc. and United Airlines Holdings, Inc.² (jointly, “United”) (collectively, the “Parties”), submit the following Joint Status Report:

The Parties conferred multiple times over email and had a telephonic conference on August 14, 2025.

1. **Depositions**

- On July 22, 2025, Plaintiffs issued three 30(b)(1) deposition notices to United. The deposition of Danielle Hendrickson will occur on September 5, 2025; the deposition of Hermes Pineda will occur on September 17, 2025; and the deposition of Kelly Poranski will occur on September 19, 2025.

¹ Plaintiffs’ counsel has indicated that Plaintiffs Ginnie McKnight and Adriana De Leon have been withdrawn from the case.

² The Parties previously agreed that United Airlines Holdings, Inc. would also be dismissed as a defendant because it is not an employer.

- The deposition of Plaintiff's expert will occur on September 30, 2025.
- The Parties have also conferred and have agreed that an extension of the current October 3, 2025 deadline for Defendants' rebuttal disclosure would be needed to accommodate the deposition of Plaintiff's expert. As such, the Parties respectfully request that the Court extend the deadline for Defendant's rebuttal expert disclosure from October 3, 2025 to October 31, 2025.

2. **Defendants' Outstanding Document Production**

- The Parties have had multiple communications about the production of documents and information that were previously requested or that Plaintiff believes were previously requested. The Parties have agreed to continue discussions and to take steps to finalize any outstanding written discovery issues without Court intervention. The Parties understand that they will bring any discovery issues to the Court's attention if they are unable to amicably resolve any such outstanding issues.

Dated: August 14, 2025

GINNIE MCKNIGHT, JACQUELINE GARRISON, and ADRIANA DE LEÓN, individually and on behalf of all similarly situated individuals

By: /s/Andrew T. Heldut

Evan M. Meyers (lead attorney)
Andrew T. Heldut
Joseph Dunklin
Colin P. Buscarini
MCGUIRE LAW, P.C.
55 W. Wacker Dr., 9th FL.
Chicago, IL 60601
Tel: (312) 893-7002
emeyers@mcgpc.com

Respectfully submitted,

UNITED AIRLINES, INC. and UNITED AIRLINES HOLDINGS, INC.

By: /s/Ada W. Dolph

Ada W. Dolph (lead attorney)
Paul John Yovanic, Jr
Ala Salameh
SEYFARTH SHAW LLP
233 S. Wacker Drive, Suite 8000
Chicago, IL 60606
Tel: (312) 460-5000
adolph@seyfarth.com
pyovanic@seyfarth.com

aheldut@mcgpc.com
jdunklin@mcgpc.com
cbuscarini@mcgpc.com

Counsel for Plaintiffs and the putative class

asalameh@seyfarth.com

Counsel for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on August 14, 2025, a true and correct copy of the foregoing document was filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the e-mail addresses denoted on the electronic Mail Notice List.

/s/ Andrew T. Heldut